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Attorneys for Defendant:
BAO PHUNG

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	
)	Case No. CR 11-00097 CRB
Plaintiff,)	
)	
vs.)	STIPULATION AND [PROPOSED] ORDER
)	TO MODIFY PRETRIAL RELEASE
)	CONDITIONS
)	
BAO PHUNG,)	
)	
Defendant.)	

It is hereby Stipulated by the parties in the above-captioned matter that defendant herein, Bao Phung, be allowed to modify his pretrial release conditions as follows:

Mr. Phung be allowed to travel to locations outside of the Northern District of California in order to fulfill his duties as an employee of Thanh Hoang Moving Services and also to extend his restriction time to the time that he returns

1 home from the particular moving job, within the same day, to be approved by
2 Pre-Trial Services.

3 Mr. Anthony R. Granados, the Pretrial Services Officer assigned to this
4 matter, stated that he has no objection to the conditions being modified to
5 allow Mr. Phung to work for Thanh Hoang Moving Services.
6

7
8 Date: July 18, 2011

By: _____/s/_____
Jeffry Glenn (SBN. #47357)
BERMAN, GLENN & HAIGHT
Attorney for Defendant,
Bao Phung

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13 Date: July 18, 2011

By: _____/s/_____
Robert Rees
Assistant United States Attorney

ORDER

By Stipulation of the parties,

IT IS HEREBY ORDERED that defendant Bao Phung's pretrial release conditions be modified to allow him to work for Thanh Hoang Moving Services, to travel outside the Northern District for work and to extend his restriction time to return home from work at a time approved by Pre-Trial Services.

Date: July 20, 2011

By: 
The Hon. Joseph C. Spero
United States Magistrate Judge